

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	CASE NO. 24-35761
	§	
JETALL COMPANIES, INC.,	§	CHAPTER 7
	§	
DEBTOR.	§	

**EMERGENCY MOTION TO DISQUALIFY MATTHEW OKIN AND
OKIN ADAMS BARTLETT CURRY LLP AS BANKRUPTCY COUNSEL
TO DOUGLAS BRICKLEY, CHAPTER 7 TRUSTEE**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

Emergency Relief Has Been Requested. If the Court considers the Motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE JEFFREY P. NORMAN:

Ali Choudhri (the “Movant”), hereby moves on an emergency basis to disqualify Matthew Okin and the law firm of Okin Adams Bartlett Curry LLP as Bankruptcy Counsel to Douglas Brickley, Chapter 7 Trustee in this proceeding pursuant to 11 U.S.C. §§ 105(a), and 327(a), Federal Rule of Bankruptcy Procedure 2014, and Local Rule of Bankruptcy Procedure 2014-1, and in support thereof respectfully shows the Honorable Court as follows:

1. Movant brings this motion to disqualify Matthew Okin and his law firm Okin Adams Bartlett Curry LLP (collectively, “Okin Adams”) due to their direct conflicts of interest

with the Bankruptcy Estate. Due to his firm's prior connections and ongoing interests adverse to the bankruptcy estate of Jetall Companies, Inc., Okin Adams is not "disinterested" within the meaning of 11 U.S.C. §§ 101(14) and 327(a), and holds interests materially adverse to the estate under *In re West Delta Oil Co.*, 432 F.3d 347, 355 (5th Cir. 2005) and *In re American Int'l Refinery*, 676 F.3d 455, 461 (5th Cir. 2012). Therefore, Okin Adams may not serve as counsel to Douglas Brickley, Chapter 7 Trustee (the "Trustee") in this bankruptcy case pursuant to 11 U.S.C. § 327(a).

2. The Trustee was elected at the 341 meeting of creditors held on April 22, 2025.¹

3. The following day, on April 23, 2025 the Trustee was added to the case. On the same day, Okin Adams appeared on behalf of the Trustee. To date, no application to employ Okin Adams has been filed pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a), and no verified statement disclosing Okin Adams' connections to the Debtor, creditors, and any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee has been filed.

4. The Movant is aware of the following connections that prevent Okin Adams from being disinterested as required by 11 U.S.C. § 327(a). Okin Adams currently represents Randy Williams, the Chapter 7 Trustee in *In re Houston Real Estate Properties LLC*, Case No. 22-32998, pending before this Bankruptcy Court (the "HREP Bankruptcy"). Okin Adams was retained in that case pursuant to section 327(a). See Exhibit 1. In that capacity, Okin Adams objected to the proof of claim filed by Jetall Companies, Inc. in the HREP Bankruptcy. See Exhibit 2. Okin Adams have also appeared on behalf of Randy Williams, Chapter 7 Trustee in adversary proceeding 23-03141, styled *John Quinlan et al. v. Jetall Companies, Inc., et al.*, pending before this Bankruptcy Court (the "Adversary Proceeding"). See Exhibit 3. Additionally,

¹ The Movant reserves all rights regarding the election of the Trustee.

Okin Adams received *Louisiana World Exposition* and responded to demands from the Plaintiffs, and Okin Adams thereafter negotiated on behalf of and represented Randy Williams, Chapter 7 Trustee in selling the claims of HREP asserted by the Plaintiffs in the Adversary Proceeding. *See Exhibit 4, Exhibit 5, and Exhibit 6.* In this regard, according to their billing records in the HREP Bankruptcy, Okin Adams conducted research and analyzed the *alter ego* claims, considered “conflicts with other entities, and property of the estate.” *See Exhibit 7.* Okin Adams advised Randy Williams, Chapter 7 Trustee regarding bringing the litigation claims on behalf of the bankruptcy estate. *See Exhibit 5, Exhibit 6.* To this day, Randy Williams, Chapter 7 Trustee, represented by Okin Adams, is identified on the docket sheet as a Defendant in the Adversary Proceeding and HREP is an expressly named defendant, alleged to be the alter ego of Jetall Companies, Inc.

5. The position of Okin Adams as bankruptcy counsel to Randy Williams, Chapter 7 Trustee for HREP is adverse to the interests of Jetall Companies, Inc. and Douglas Brickley, Chapter 7 Trustee for Jetall Companies, Inc. These undisclosed connections require the immediate disqualification of Okin Adams.

6. In addition to the adverse interests relating to HREP, Okin Adams previously represented ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC jointly administered debtors in Case Nos. 14-35322 and 14-35323, before this Court. In connection with that engagement, Ali Choudhri directed the actions of Okin Adams in representing the Debtors in those jointly administered cases, in which a chapter 11 plan was confirmed and Jetall Companies, Inc. was the purchaser of the Debtor’s assets under that plan. Through its representation of the Debtors under Mr. Choudhri's direction, Okin Adams obtained privileged and confidential information including: (1) Mr. Choudhri's litigation strategies and decision-making processes in bankruptcy proceedings; and (2) his mental impressions and

strategic considerations regarding business operations. This confidential information is directly relevant to and could be used adversely in the current matter against Mr. Choudhri . This violates Rule 1.09(a)(2) of the Texas Rules of Professional Conduct and serves as an independent basis for disqualifying Okin Adams.

7. An emergency hearing is necessary in this matter due to the immediate and ongoing harm being caused by Okin Adams' continued representation of Doug Brickley while lacking disinterestedness and possessing and potentially utilizing privileged and confidential information relating to Mr. Choudhri. The following factors demonstrate the urgency of this situation: (A) Okin Adams previously represented ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC while under the direction of Mr. Choudhri and obtained substantial privileged and confidential information during the course of that representation; (B) the current matter is sufficiently and substantially related to Okin Adams' prior representation of ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC, creating an inherent conflict of interest; (C) there is a reasonable probability that Okin Adams has access to and may be using confidential and privileged information developed during the representation of ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC to Mr. Choudhri's detriment in the current proceedings; (D) the continued representation violates Texas Disciplinary Rules of Professional Conduct 1.06 and 1.09 regarding conflicts of interest and duties to former clients; (E) Mr. Choudhri faces immediate and irreparable harm if Okin Adams continues its representation of Douglas Brickley while possessing his privileged information; (F) the balance of equities favors immediate disqualification as Mr. Brickley can obtain alternative counsel while Mr. Choudhri cannot unring the bell of disclosed confidences; and (G) public policy strongly favors maintaining attorney-client confidentiality and preventing even the appearance of impropriety in legal proceedings.

8. Therefore, Movant respectfully requests an emergency hearing to address this matter and seek immediate disqualification of Okin Adams from representing Doug Brickley in this proceeding.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully requests that this Court enter an order: (1) disqualifying Matthew Okin and Okin Adams Bartlett Curry LLP from representing any party in this proceeding; and (2) granting such other and further relief to which Movant may be justly entitled.

Respectfully submitted,

/s/ Justin Rayome

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COUNSEL FOR ALI CHOUDHRI

CERTIFICATE OF SERVICE

I hereby certify that on 7th day of May, 2025, a true and correct copy of the foregoing pleading was served via regular US Mail or email where reflected by email address on each of the parties on the attached service list, which is the Court's mailing list for this case.

/s/ Justin Rayome

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